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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND AD HOC GROUP OF  
INSTITUTIONAL BONDHOLDERS OF  
PACIFIC GAS AND ELECTRIC CO.  
EXTENDING TIME TO RESPOND TO  
MOTIONS TO BE HEARD ON  
FEBRUARY 27, 2019**

[No Hearing Requested]

STIPULATION TO EXTEND TIME FOR AD HOC

1 This stipulation and agreement for order (“Stipulation and Agreement for Order”) is  
2 entered into by and between PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric  
3 Company (the “Utility”), as debtors and debtors in possession (collectively, the “Debtors”) and  
4 the Ad Hoc Group of Institutional Bondholders of Pacific Gas and Electric Co. (the “Ad Hoc  
5 Group of Institutional Bondholders”). The Debtors and the Ad Hoc Group of Institutional  
6 Bondholders are referred to in this Stipulation and Agreement for Order collectively as the  
7 “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as follows:

8 **RECITALS**

9 A. On February 6, 2019, the Debtors filed a notice of hearing [Dkt. 353] noticing  
10 sixteen (16) motions listed therein (the “Motions”) for a hearing before the Court at 9:30 a.m. on  
11 February 27, 2019.

12 B. Under Local Bankruptcy Rule 9014-1(c)(2), any opposition or response to the  
13 Motions must be filed and served on counsel for the Debtors no later than February 20, 2019.

14 C. On February 20, 2019, counsel for the Ad Hoc Group of Institutional Bondholders  
15 requested, and proposed counsel for the Debtors agreed, that the time for the Ad Hoc Group of  
16 Institutional Bondholders to respond to the Motions be extended by two days.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
21 **THAT:**

22 1. The time for the Ad Hoc Group of Institutional Bondholders to file and  
23 serve any response or opposition to the Motions be extended up to and including 4:00 p.m. (Pacific  
24 Standard Time) on February 22, 2019.

25 *[Signatures on Next Page]*

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Dated: February 20, 2019

KELLER & BENVENUTTI LLP

*/s/ Jane Kim*

Jane Kim

*Proposed Attorneys for Debtors  
and Debtors in Possession*

Dated: February 20, 2019

PROSKAUER ROSE LLP

*/s/ Brian S. Rosen*

Brian S. Rosen

*Attorneys for Ad Hoc Group of  
Institutional Bondholders of Pacific Gas  
and Electric Company*